INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

April 21, 2004

TO: Interested Parties / Applicant

RE: Milso Industries / T177-17527-00061

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

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PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Milso Industries
401 Industrial Parkway
Richmond, Indiana 47374

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR, Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR, Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 177-17527-00061	
Issued by: Original signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 21, 2004 Expiration Date: April 21, 2009

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Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

[326 IAC 2-7-5]

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary metal burial casket manufacturing source.

Responsible Official:	Owner
Source Address:	401 Industrial Parkway, Richmond, Indiana 47374
Mailing Address:	401 Industrial Parkway, Richmond, Indiana 47374
General Source Phone:	765 - 966 - 8012
SIC Code:	3995
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

Line 1, consisting of:

(a) One (1) prime spray booth, known as EU-6, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 5 and 6, capacity: 18 metal burial caskets per hour.

(b) One (1) brush spray booth, known as EU-12, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stack 10, capacity: 18 metal burial caskets per hour.

(c) One (1) color spray booth, known as EU-16, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 13 and 14, capacity: 18 metal burial caskets per hour.

(d) One (1) topcoat spray booth, known as EU-21, equipped with electrostatic spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 18 and 19, capacity: 18 metal burial caskets per hour.

(e) One (1) touchup spray booth, known as EU-27A, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1997, exhausting through Stack 22, capacity: 3 metal burial caskets per hour.

(f) One (1) power wash/dry operation, known as EU-3, equipped with a spray wand applicator or hand application, capacity: 18 metal burial caskets per hour.

(g) One (1) final assembly area, known as EU-26, capacity: 18 metal burial caskets per hour.

(h) One (1) maintenance cleanup of carts, known as EU-maintenance, capacity: 1 cart per hour.

(i) One (1) interior application spray booth, known as EU-29, used to supplement EU-6, EU-12, EU-16 or EU-21 as necessary to maintain capacity of 18 metal burial caskets per hour.

Line 2, consisting of:

(j) One (1) prime spray booth, known as EU-30, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 31, capacity: 18.75 metal burial caskets per hour.

(k) One (1) brush spray booth, known as EU-31, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 33, capacity: 18.75 metal burial caskets per hour.

(l) One (1) color spray booth, known as EU-32, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stacks 35 and 36, capacity: 18.75 metal burial caskets per hour.

(m) One (1) topcoat spray booth, known as EU-33, constructed in 2003, equipped with electro-static spray applicators or equivalent and dry filters for overspray control, exhausting through Stacks 38 and 39, capacity: 18.75 metal burial caskets per hour.

(n) One (1) touch-up spray booth, known as EU-34, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 41, capacity: 3.0 metal burial caskets per hour.

(o) One (1) final assembly area, known as EU-35, constructed in 2003, capacity: 18.75 metal burial caskets per hour.

(p) One (1) cleaning operation, known as EU-36, constructed in 2003, capacity: 18.75 metal burial caskets per hour.

(q) One (1) material storage room, known as EU-54, constructed in 2003, exhausting through Stack 42, emissions associated with EU-30, 31, 32, 33 and 35.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(b) Brush process (ID #11 on flow sheet) emits PM in quantities below 5 pounds per hour and 25 pounds per day. (CP 177-5117 limits its emissions to 2.36 pounds per hour.) This process uses belt sanding machines to texture the top of metal burial caskets. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, regional office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense

against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which

cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may

invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52, Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52, Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3)

square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility

while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report

or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Line 1

(a) One (1) prime spray booth, known as EU-6, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 5 and 6, capacity: 18 metal burial caskets per hour.

(b) One (1) brush spray booth, known as EU-12, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stack 10, capacity: 18 metal burial caskets per hour.

(c) One (1) color spray booth, known as EU-16, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 13 and 14, capacity: 18 metal burial caskets per hour.

(d) One (1) topcoat spray booth, known as EU-21, equipped with electrostatic spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 18 and 19, capacity: 18 metal burial caskets per hour.

(e) One (1) touchup spray booth, known as EU-27A, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1997, exhausting through Stack 22, capacity: 3 metal burial caskets per hour.

(f) One (1) power wash/dry operation, known as EU-3, equipped with a spray wand applicator or hand application, capacity: 18 metal burial caskets per hour.

(g) One (1) final assembly area, known as EU-26, capacity: 18 metal burial caskets per hour.

(h) One (1) maintenance cleanup of carts, known as EU-maintenance, capacity: 1 cart per hour.

(i) One (1) interior application spray booth, known as EU-29, used to supplement EU-6, EU-12, EU-16 or EU-21 as necessary to maintain capacity of 18 metal burial caskets per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at **http://www.epa.gov/ttn/atw/misc/miscpg.html**. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.1.3 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP 177-4586 issued on September 27, 1995, the total input of VOC to the above emission units, and the emission units in Section D.2 of this permit, shall be less than 249 tons of VOC including coatings, dilution solvents and cleaning solvents per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP 177-4586 issued on September 27, 1995, the Permittee shall use high volume low pressure (HVLP) spray applicators and a water-based primer with a VOC content of less than or equal to 2.3 pounds per gallon of coating less water. This was deemed to be the Best Available Control Technology, and as such satisfies the requirements of 326 IAC 8-1-6 (New facilities: general reduction requirements). The Permittee shall use high volume low pressure (HVLP) spray applicators or equivalent, or electrostatic spray applicators or equivalent having the same or greater transfer efficiencies.

High Volume Low Pressure (HVLP) Spray Application is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten

(10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.5 Particulate [40 CFR 52 Subpart P]

Pursuant to T 177-8217-00061, issued on December 16, 1998, and 40 CFR 52 Subpart P, the particulate from the prime spray booth (EU-6), the brush spray booth (EU-12), the color spray booth (EU-16), the topcoat spray booth (EU-21), the touch-up spray booth (EU-27A), and the interior application spray booth, (EU-29) shall each be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.6 Particulate [326 IAC 6-3-2(d)]

Pursuant to T 177-8217-00061, issued on December 16, 1998, and 326 IAC 6-3-2(d), particulate from the prime spray booth (EU-6), the brush spray booth (EU-12), the color spray booth (EU-16), the topcoat spray booth (EU-21), the touch-up spray booth (EU-27A), and the interior application spray booth (EU-29) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]

Compliance with the VOC content and/or usage limitations contained in Conditions D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks 5, 6, 10, 13, 14, 18, 19 and 22 while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result

in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit established in Condition D.1.3, and the VOC content limit established in Condition D.1.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.1.6 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.1.12 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than January 2, 2005.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial

compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than April 2, 2006.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Line 2

(j) One (1) prime spray booth, known as EU-30, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 31, capacity: 18.75 metal burial caskets per hour.

(k) One (1) brush spray booth, known as EU-31, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 33, capacity: 18.75 metal burial caskets per hour.

(l) One (1) color spray booth, known as EU-32, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stacks 35 and 36, capacity: 18.75 metal burial caskets per hour.

(m) One (1) topcoat spray booth, known as EU-33, constructed in 2003, equipped with electrostatic spray applicators or equivalent and dry filters for overspray control, exhausting through Stacks 38 and 39, capacity: 18.75 metal burial caskets per hour.

(n) One (1) touch-up spray booth, known as EU-34, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 41, capacity: 3.0 metal burial caskets per hour.

(o) One (1) final assembly area, known as EU-35, constructed in 2003, capacity: 18.75 metal burial caskets per hour.

(p) One (1) cleaning operation, known as EU-36, constructed in 2003, capacity: 18.75 metal burial caskets per hour.

(q) One (1) material storage room, known as EU-54, constructed in 2003, exhausting through Stack 42, emissions associated with EU-30, 31, 32, 33 and 35.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after January 2, 2004.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at **http://www.epa.gov/ttn/atw/misc/miscpg.html**. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after January 2, 2007.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

(c) The affected source is the collection of all of the items listed in 40 CFR 63.3882, paragraphs (b)(1) through (4) that are used for surface coating of miscellaneous metal parts and products within each subcategory as defined in 40 CFR 63.3881(a), paragraphs (2) through (6).

(1) All coating operations as defined in 40 CFR 63.3981;

(2) All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;

(3) All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and

(4) All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.

(d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.3980, and are applicable to the affected source.

D.2.3 PSD Minor Limit [326 IAC 2-2]

Pursuant to SSM 177-16906-00061, issued July 2, 2003, the total input of VOC to the above emission units, and the emission units listed in Section D.1 of this permit, shall be less than 249 tons of VOC including coatings, dilution solvents and cleaning solvents per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to SSM 177-16906-00061, issued July 2, 2003, and 326 IAC 8-1-6, Best Available Control Technology (BACT) for the burial casket manufacturing line, identified as Line 2, has been determined to be:

(a) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 160 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(b) The method of application at the proposed burial casket manufacturing line shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent, or electrostatic

spray applicators or equivalent having the same or greater transfer efficiencies; and

(c) The following management and work practices shall apply:

(1) Operator training course.

(2) Spray gun cleaning.

(3) The cleanup solvent containers used to transport solvent from drums/ containers to work stations be closed containers having soft gasketed closures.

(4) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(5) Storage containers used to store VOC containing materials shall be kept covered when not in use.

(6) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

D.2.5 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Pursuant to SSM 177-16906-00061, issued July 2, 2003, and 326 IAC 2-4.1-1, the HAPs usage at the prime spray booth (EU-30), the brush spray booth (EU-31), the color spray booth (EU-32), the topcoat spray booth (EU-33), the touch-up spray booth (EU-34), the one (1) final assembly area (EU-35) and the one (1) cleaning operation (EU-36) shall be limited to no more than 1.94 pounds of organic HAP per gallon of coating solids used during the most recent twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall include all coatings, thinners, additives and cleaning materials.

D.2.6 Particulate [40 CFR 52 Subpart P]

Pursuant to SSM 177-16906-00061, issued July 2, 2003, and 40 CFR 52 Subpart P, the particulate from the prime spray booth (EU-30), the brush spray booth (EU-31), the color spray booth (EU-32), the topcoat spray booth (EU-33), and the touch-up spray booth (EU-34) shall each be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.7 Particulate [326 IAC 6-3-2(d)]

Pursuant to SSM 177-16906-00061, issued July 2, 2003, and 326 IAC 6-3-2(d), particulate from the prime spray booth (EU-30), the brush spray booth (EU-31), the color spray booth (EU-32), the topcoat spray booth (EU-33), and the touch-up spray booth (EU-34) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

D.2.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.9 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)] [326 IAC 8-1-2(a)]

Compliance with the VOC usage limitations contained in Conditions D.2.3 and D.2.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.10 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

Compliance with the HAP content limit in Condition D.2.5 shall be determined at the end of each month by using the following equation and shall be based on the most recent twelve (12) consecutive month period:

$$\text{HAP usage} = \frac{\text{Weight of organic HAP used from all coatings, thinners, additives and cleanup materials (lbs)}}{\text{Total volume of coating solids used (gal)}}$$

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.11 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks 31, 33, 35, 36, 38, 39 and 41 while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.12 Record Keeping Requirements

(a) To document compliance with Conditions D.2.3 and D.2.4 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.3 and D.2.4. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken as stated below and shall be complete and sufficient to establish compliance with the HAP content limit established in Condition D.2.5. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The HAP content of each coating material (including coatings, additives and thinners) and solvent used.

(2) The solids content of each coating used.

(3) The amount of coating material and solvent used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(4) The total amount of HAPs used each month.

(5) The total coating solids usage each month.

(6) The HAP usage in pounds of HAPs per gallon of coating solids for each compliance period.

(c) To document compliance with Conditions D.2.7 and D.2.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.3 and D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.2.14 Notification Requirements [40 CFR 63.3910]

(a) General. The Permittee must submit the applicable notifications in 40 CFR Part 63, Sections 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) by the dates specified in those sections, except as provided in 40 CFR 63.3910, paragraphs (b) and (c).

(b) Initial notification. The Permittee must submit the initial notification no later than January 2, 2005.

(c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR Part 63, Sections 63.3940, 63.3950, or 63.3960 that applies to the affected source. The notification of compliance status must contain the information specified in 40 CFR 63.3910(c), paragraphs (1) through (11) and any additional information specified in 40 CFR 63.9(h).

D.2.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Title V permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Title V permit the applicable requirements of 40 CFR 63, Subpart MMMM, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than April 2, 2006.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(b) Brush process emits PM in quantities below 5 pounds per hour and 25 pounds per day. This process uses belt sanding machines to texture the top of metal burial caskets. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2, the particulate from the insignificant manufacturing activities, including the brush stations, but excluding the welding operations, shall each be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Milso Industries
Source Address: 401 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: 401 Industrial Parkway, Richmond, Indiana 47374
Part 70 Permit No.: T 177-17527-00061

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Milso Industries
Source Address: 401 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: 401 Industrial Parkway, Richmond, Indiana 47374
Part 70 Permit No.: T 177-17527-00061

This form consists of 2 page **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Milso Industries
Source Address: 401 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: 401 Industrial Parkway, Richmond, Indiana 47374
Part 70 Permit No.: T 177-17527-00061
Facilities: The two (2) burial casket manufacturing lines (Line 1 and Line 2)
Parameter: Total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: 249 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Milso Industries
Source Address: 401 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: 401 Industrial Parkway, Richmond, Indiana 47374
Part 70 Permit No.: T 177-17527-00061
Facilities: The one (1) burial casket manufacturing line (Line 2)
Parameter: Total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents
Limit: Less than 160 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Milso Industries
Source Address: 401 Industrial Parkway, Richmond, Indiana 47374
Mailing Address: 401 Industrial Parkway, Richmond, Indiana 47374
Part 70 Permit No.: T 177-17527-00061

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	**Milso Industries**
Source Location:	**401 Industry Parkway, Richmond, Indiana 47374**
County:	**Wayne**
SIC Code:	**3995**
Operation Permit No.:	**T 177-17527-00061**
Permit Reviewer:	**Edward A. Longenberger**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Milso Industries relating to the operation of metal burial casket manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Line 1, consisting of:

(a) One (1) prime spray booth, known as EU-6, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 5 and 6, capacity: 18 metal burial caskets per hour.

(b) One (1) brush spray booth, known as EU-12, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stack 10, capacity: 18 metal burial caskets per hour.

(c) One (1) color spray booth, known as EU-16, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 13 and 14, capacity: 18 metal burial caskets per hour.

(d) One (1) topcoat spray booth, known as EU-21, equipped with electrostatic spray applicators or equivalent and dry filters for over spray control, constructed in March 1996, exhausting through Stacks 18 and 19, capacity: 18 metal burial caskets per hour.

(e) One (1) touchup spray booth, known as EU-27A, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for over spray control, constructed in March 1997, exhausting through Stack 22, capacity: 3 metal burial caskets per hour.

(f) One (1) power wash/dry operation, known as EU-3, equipped with a spray wand applicator or hand application, capacity: 18 metal burial caskets per hour.

(g) One (1) final assembly area, known as EU-26, capacity: 18 metal burial caskets per hour.

(h) One (1) maintenance cleanup of carts, known as EU-maintenance, capacity: 1 cart per hour.

(i) One (1) interior application spray booth, known as EU-29, used to supplement EU-6, EU-12, EU-16 or EU-21 as necessary to maintain capacity of 18 metal burial caskets per hour.

Line 2, consisting of:

(j) One (1) prime spray booth, known as EU-30, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 31, capacity: 18.75 metal burial caskets per hour.

(k) One (1) brush spray booth, known as EU-31, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 33, capacity: 18.75 metal burial caskets per hour.

(l) One (1) color spray booth, known as EU-32, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stacks 35 and 36, capacity: 18.75 metal burial caskets per hour.

(m) One (1) topcoat spray booth, known as EU-33, constructed in 2003, equipped with electro-static spray applicators or equivalent and dry filters for overspray control, exhausting through Stacks 38 and 39, capacity: 18.75 metal burial caskets per hour.

(n) One (1) touch-up spray booth, known as EU-34, constructed in 2003, equipped with high volume low pressure (HVLP) spray applicators or equivalent and dry filters for overspray control, exhausting through Stack 41, capacity: 3.0 metal burial caskets per hour.

(o) One (1) final assembly area, known as EU-35, constructed in 2003, capacity: 18.75 metal burial caskets per hour.

(p) One (1) cleaning operation, known as EU-36, constructed in 2003, capacity: 18.75 metal burial caskets per hour.

(q) One (1) material storage room, known as EU-54, constructed in 2003, exhausting through Stack 42, emissions associated with EU-30, 31, 32, 33 and 35.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. (Total heat input capacity of all natural gas fired combustion units at the source is now 25.0 million British thermal units per hour.)

(b) The following VOC and HAP storage containers: Vessels storing lubricating oil, hydraulic oils,

machining oils, and machining fluids. Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(c) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]

(e) Infrared cure equipment.

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(g) Paved and unpaved roads and parking lots with public access.

(h) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(i) Filter or coalescer media changeout.

(j) Welding/brush stations, including:

(1) MIG welding stations utilizing electrodes with 1 percent or less manganese - actual HAP emissions from these stations combined is 0.3 pounds per 8 hour shift.

(2) TIG welding stations - actual HAP emissions from these stations combined (combined for all 3 stations and for combination of 4 HAPs) is 0.3 pounds per hour. HAPs are phosphorus, lead, nickel, manganese (concentrations ranging from 0.05 - 1 percent by weight).

(3) Brush process emits PM in quantities below 5 pounds per hour and 25 pounds per day. This process uses belt sanding machines to texture the top of metal burial caskets. [326 IAC 6-3-2]

(4) MIG/TIG/arc welding stations emitting greater than one (1) pounds per day but less than 5 pounds per day of HAPs.

Existing Approvals

The source has constructed and/or has been operating under the following previous approvals including:

(a) T 177-8217-00061, issued on December 16, 1998;

(b) MPM 177-11515-00061, issued March 7, 2000;

(c) Reopening 177-13529-00061, issued March 19, 2002;

(d) SSM 177-16906-00061, issued July 2, 2003; and

(e) SPM 177-16980-00061, pending.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on March 17, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	**Potential Emissions** (tons/year)
PM	less than 100
PM_{10}	less than 100
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_X	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Worst case single HAP	greater than 10

Total HAPs	greater than 25

(a) The unrestricted potential emissions of VOC are equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	**Actual Emissions** (tons/year)
PM	not reported
PM_{10}	0
SO_2	not reported
VOC	49
CO	not reported
NO_X	not reported
HAP (specify)	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Line 1	50.1	50.1	-	Less than 249	-	-	237
Line 2	31.0	31.0	-		-	-	24.7
Insignificant Activities	5.00	5.00	0.500	1.00	2.00	5.00	1.00
Total Emissions	86.1	86.1	0.500	Less than 250	2.00	5.00	263

County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Wayne County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) This Part 70 Operating Permit does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1, with the potential to emit before controls equal to or greater than the major source threshold for any criteria pollutant. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

(b) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(c) The metal surface coating operations are subject to the National Emission Standards for

Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, 40 CFR 63, Subpart MMMM. Line 1 and Line 2 are considered existing sources pursuant to 40 CFR 63.3882. The U.S. EPA Administrator has signed and will publish a final Maximum Achievable Control Technology Standard (MACT) at 40 CFR 63, Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products. A copy of the signed version of the MACT is currently available on the U.S. EPA website, http://www.epa.gov/ttn/oarpg/t3pfpr.html, and will be published in the *Federal Register*.

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the affected source described in this section except when otherwise specified in 40 CFR 63 Subpart MMMM.

This rule has a future compliance date; therefore, the specific details of the rule and how the Permittee will demonstrate compliance are not provided in the permit. The Permittee shall submit an application for a significant permit modification nine months prior to the compliance date for the MACT that will specify the option or options for the emission limitations and standards and methods for determining compliance chosen by the Permittee. At that time, IDEM, OAQ will include the specific details of the rule and how the Permittee will demonstrate compliance. In addition, pursuant to 40 CFR 63, Subpart MMMM, the Permittee shall submit:

(1) An Initial Notification containing the information specified in 40 CFR 63.9(b)(2) no later than one (1) year after the effective date of 40 CFR 63, Subpart MMMM.

(2) A Notification of Compliance Status containing the information required by 40 CFR 63.9(h) in accordance with 40 CFR 63.3910(c). The Notification of Compliance Status must be submitted no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.3940, 40 CFR 63.3950, or 40 CFR 63.3960 that applies to your affected source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was constructed after August 7, 1977, and it is not one of the 28 listed source categories under 326 IAC 2-2. The unrestricted potential to emit of PM_{10}, NO_X, CO and SO_2 are each less than two hundred fifty (250) tons per year. Pursuant to CP 177-4586, issued September 27, 1995, the source shall limit VOC emissions to less than two hundred fifty (250) tons per year. Therefore, this source is a minor source with respect to 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC in Wayne County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirements as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary

alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1-1 (New source toxics control)

(a) The burial casket manufacturing line, identified as Line 1, was constructed before the applicability date of July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 are not applicable to the burial casket manufacturing line identified as Line 1.

(b) The one (1) interior application spray booth, known as EU-29, constructed in 2000, used to supplement EU-6, EU-12, EU-16 or EU-21 as necessary to maintain capacity of 18 metal burial caskets per hour, is not subject to the requirements of 326 IAC 2-4.1 because the booth has a potential to emit of HAPs less than ten (10) tons per year of a single HAP, and less than twenty-five (25) tons per year of total HAPs.

(c) The burial casket manufacturing line, constructed in 2003, identified as Line 2, is subject to the requirements of 326 IAC 2-4.1-1 because the potential to emit of HAPs is greater than ten (10) tons per twelve (12) consecutive month period for a single HAP. Line 2 applies coatings to metal parts. As a condition of SSM 177-16906-00061, issued July 2, 2003, the applicant has agreed to limit HAP emissions such that they would comply with the Maximum Achievable Control Technology requirements of the proposed NESHAP for surface coating of miscellaneous metal parts, 40 CFR 63, Subpart MMMM, published in the Federal Register, Vol. 67, No. 156, on August 13, 2002.

Therefore, the amount of HAPs used shall be less than 1.94 pounds of organic HAP per gallon of coating solids used during the most recent twelve (12) consecutive month period, with compliance determined at the end of each month. This limit shall include all coatings, thinners, additives and cleaning materials which are used at the burial casket manufacturing line (Line 2). In order to comply with this limit, the Permittee must keep track of the total mass of organic HAP in each coating, thinner, additive, or cleaning material used, and the total volume of all coating solids used during each month. The mass of organic HAP used during the most recent twelve (12) month period divided by the volume of coating solids used for the same twelve (12) month period must be less than 1.94 pounds of organic HAP per gallon of coating solids, as determined each month.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable

requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate from the spraying operations at each of the burial casket manufacturing lines (Line 1 and Line 2), shall each be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Under the rule revision, particulate from the spraying operations shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The potential to emit VOC from each of the burial casket manufacturing lines is greater than twenty-five (25) tons per year. Therefore, the burial casket manufacturing lines are subject to the Best Available Control Technology (BACT) requirements, pursuant to 326 IAC 8-1-6.

(a) The burial casket manufacturing line, identified as Line 1, is subject to 326 IAC 8-1-6. The use of high volume low pressure (HVLP) spray applicators and a water-based primer with a VOC content of 2.3 pounds per gallon less water was deemed to be the Best Available Control Technology pursuant to CP 177-4586 issued on September 27, 1995, and as such satisfies the requirements of this rule.

High-volume low-pressure spray is an acceptable alternative application of air-assisted airless spray. High-volume low-pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The applicant requested a change of spray applicators for the top coat booth, EU-21, from high volume low pressure (HVLP) spray applicators to electrostatic in correspondence dated July 1, 1997 to IDEM. The request was approved and incorporated in the original Part 70 permit for this source (T 177-8217-00061, issued on December 16, 1998). The use of high volume low pressure (HVLP) spray applicators spray applicators or electrostatic spray applicators having the same or greater transfer efficiencies will satisfy 326 IAC 8-1-6.

(b) Pursuant to SSM 177-16906, BACT for the burial casket manufacturing line, identified as Line 2, has been determined to be:

(1) The total VOC delivered to the applicators, including coatings, dilution solvents, and cleaning solvents, shall be limited to less than 160 tons per twelve (12) consecutive month period, with compliance determined at the end of each month;

(2) The method of application at the proposed burial casket manufacturing line shall be performed with high volume-low pressure (HVLP) spray applicators or the equivalent, or electrostatic spray applicators or equivalent having the same or greater transfer efficiencies; and

(3) The following management and work practices shall apply:

(A) Operator training course.

(B) Spray gun cleaning.

(C) The cleanup solvent containers used to transport solvent from drums/ containers to work stations be closed containers having soft gasketed closures.

(D) The application equipment operators shall be instructed and trained on the methods and practices utilized to minimize spillage on the floor and over application.

(E) Storage containers used to store VOC and/or HAPs containing materials shall be kept covered when not in use.

(F) Cleanup solvents will be reused in the process as much as possible to reduce hazardous waste and the related impact on the environment.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This source is located in Wayne County. Pursuant to 326 IAC 8-2-9(b)(10), the burial casket manufacturing lines are not subject to the requirements of 326 IAC 8-2-9, since this source is not located in or adjacent to a county that is classified as nonattainment for ozone.

State Rule Applicability - Insignificant Activities

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

(a) Pursuant to 326 IAC 6-3-2, the particulate from the insignificant manufacturing activities, including the brush stations, but excluding the welding operations, shall each be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E =rate of emission in pounds per hour and
P =process weight rate in tons per hour

(b) Pursuant to 326 IAC 6-3-1(b)(9), the welding operations are exempt from the requirements of this rule because the source uses less than 625 pounds of welding wire per day.

Testing Requirements

All emission calculations were based on the Material Safety Data Sheets (MSDS) and/or AP-42 emission factors. Therefore, no testing is required.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The burial casket manufacturing lines (Line 1 and Line 2) have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth Stacks 5, 6, 10, 13, 14, 18, 19, 22, 31, 33, 35, 36, 38, 39 and 41 while one (1) or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the filters for the surface coating spray booths must operate properly to ensure compliance with 326 IAC 6-3, 40 CFR Subpart P and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this metal burial casket manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. **T 177-17527-00061**.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for a Part 70 Operating Permit Renewal

Source Name: **Milso Industries**
Source Location: **401 Industry Parkway, Richmond, Indiana 47374**
County: **Wayne**
SIC Code: **3995**
Operation Permit No.: **T 177-17527-00061**
Permit Reviewer: **Edward A. Longenberger**

On November 22, 2003, the Office of Air Quality (OAQ) had a notice published in the Palladium Item, Richmond, Indiana, stating that Milso Industries had applied for a Part 70 Operating Permit Renewal to operate a metal burial casket manufacturing source with dry filters for particulate control. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit Renewal should be issued as proposed.

On December 18, 2003, Dale Palmer of Milso Industries submitted comments on the proposed Part 70 Operating Permit Renewal. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comment 1:

Conditions D.1.10(a)(2), D.2.12(a)(2), and D.2.12(b)(3): Milso requests to revise the language in these conditions to clarify that purchase orders **or** invoices shall be retained as records to verify the type and amount of coating material or solvent less water used on a monthly basis.

Response 1:

In each case, the draft permit language reads as follows:

> Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

IDEM, OAQ agrees that the Permittee need only keep the records that are necessary to verify the type and amount of coating materials and solvents that are used at the facility. As such, the Permittee may choose to keep either purchase orders or invoices, so long as there is a complete record of the amounts of coatings and solvents used.

Comment 2:

Conditions D.1.13 and D.2.15: Milso requests that the requirement to submit a significant permit modification application within 27-months after the effective date of Title 40 of the Code of Federal Regulations, Part 63 (40 CFR 63), Subpart MMMM be removed. Milso understands that a significant permit modification application must be submitted in a timely manner in order for IDEM to establish federally-enforceable limits allowing facilities to opt out of major Hazardous Air Pollutant (HAP) status. However, if a facility does not request a federally-enforceable limit, Milso believes that the routine submittal of a Part 70 permit renewal application will incorporate the requirements specified in Subpart

MMMM into the Part 70 permit in a sufficient time frame. Milso believes the submittal of a Part 70 permit renewal application as the vehicle for incorporating specific Subpart MMMM provisions into the Part 70 permit is sufficient for the following reasons:

1. Milso is not required to comply with Subpart MMMM until three (3) years (36 months) after the effective date. Milso has not decided upon a Subpart MMMM compliance method given the options in the final rule. Milso may be no closer to determining a Subpart MMMM compliance method within 27-months after the effective date than we are today. Hence, the entirety of Subpart MMMM (with all compliance options listed) could be included in the current proposed Part 70 Operating Permit Renewal and still contain as much definitive information as a significant modification application 27 months from now.

2. Section D.1.3 clearly specifies that Subpart MMMM is applicable to the Richmond Plant; therefore, Milso feels that IDEM can rely on this section (to require Milso's Subpart MMMM compliance) until a Part 70 permit renewal application is submitted.

3. Although dependent on the effective date of Subpart MMMM, it is possible that Milso's Part 70 permit will have less than three (3) years remaining once the first substantive Subpart MMMM compliance requirement occurs (besides the initial notification). Per 326 IAC 2-7-9, IDEM is not obligated to reopen a Part 70 permit to add additional applicable requirements (i.e., Subpart MMMM requirements) unless the Part 70 remaining term is three (3) or more years. Milso requests that IDEM exercise its regulatory discretion to not require unnecessary paperwork in the form of a significant modification application given the timelines involved.

Based on these factors, Milso believes the requirement to submit a significant permit modification application prior to the submittal of a Part 70 permit renewal application is unnecessary and overly burdensome for both IDEM and Milso. Therefore, Milso requests that this condition be removed from the Draft Part 70 Operating Permit Renewal.

Response 2:

Even though the initial compliance date for 40 CFR Part 63, Subpart MMMM, Miscellaneous Metal Parts and Products Surface Coating NESHAP, is not until January 2, 2007, 40 CFR Part 63, Subpart MMMM applies to Milso Industries (the Permittee) as of the effective date of the rule, January 2, 2004. Pursuant to 326 IAC 2-7-5, the Part 70 permit is required to identify all applicable requirements that apply to each emissions unit and to identify how the Permittee will comply with the requirements for each unit. An applicable requirement, defined in 326 IAC 2-7-1, includes requirements that have been promulgated or approved by the U.S. EPA through rulemaking at the time of permit issuance but have future compliance dates. The reopening procedures in 326 IAC 2-7-9 apply only to new additional applicable requirements that become applicable during the Part 70 permit term. Since the Part 70 permit is currently being renewed, the Part 70 permit is open and must include all current applicable requirements. Therefore, the requirements of 40 CFR Part 63, Subpart MMMM must be included in the permit at this time.

IDEM, OAQ recognizes that the requirements of 40 CFR 63, Subpart MMMM are new and that the Permittee most likely does not currently know exactly how it intends to comply with the rule. As a result, it is necessary for the Permittee to modify the permit later to include the compliance options that will be chosen as well as the additional monitoring, record keeping, and reporting requirements for the options chosen. Adding the chosen compliance options to the permit will significantly change existing monitoring, record keeping, and reporting terms of the Part 70 permit such that a significant permit modification will be required in accordance with 326 IAC 2-7-12(d)(1). 326 IAC 2-7-12(d)(2)

requires that a significant permit modification be issued within nine (9) months after the receipt of a complete application. Since the Permittee must begin to comply with the MACT starting on the compliance date, IDEM, OAQ is requiring that the significant permit modification application be submitted nine months prior to the compliance date.

IDEM, OAQ understands the concerns that the Permittee may have regarding identifying specific compliance options prior to the compliance date. IDEM, OAQ must balance these concerns with the concerns of the compliance inspector and the public who are also stakeholders for the Part 70 permit. The public and the compliance inspector are entitled to know how the Permittee has chosen to comply with the Miscellaneous Metal Parts and Products Surface Coating NESHAP by the date that compliance with the NESHAP is required. Therefore, IDEM, OAQ has established a deadline of nine months prior to the compliance date to give the Permittee as much time as possible to determine what method or methods will be used to comply with the NESHAP, while allowing time for the permit to be modified to include this important information near the compliance date.

If the Permittee continues to have concerns regarding choosing the method of compliance when the significant permit modification application is due nine months prior to the compliance date, it should be noted that the requirement to identify specific compliance options in the permit does not preclude the Permittee from choosing more than one possible option to comply with the NESHAP. The Permittee may choose more than one option to be included in the permit and can specify those options in the significant permit modification application. IDEM, OAQ will include all of the compliance options that are requested as alternative operating scenarios and require that the Permittee keep a log of the scenario that is being used for a given time period in accordance with 326 IAC 2-7-5(9). The alternative operating scenario approach provides the flexibility to switch between different compliance options that are allowed by the NESHAP, ensures compliance with the NESHAP, and ensures that it is clear to the Permittee, the public, the U.S. EPA, and IDEM, OAQ how the Permittee will comply with the NESHAP.

Therefore, no change to the permit is made as a result of this comment.

Comment 3:

In addition to submitting comments to the Part 70 Operating Permit Renewal, Milso is confirming that the “Line 2” operations described in Section D.2 are classified as an “existing source” for the purposes of Subpart MMMM applicability and compliance. This determination is based on the description of a “new affected source” in 40 CFR 63.3882(c) and a discussion between yourself and Ms. Colombe Miller of Trinity Consultants in November 2003.

Response 3:

A new affected source is defined in 40 CFR 63.3882(c) as a source that commenced its construction after August 13, 2002 and the construction is of a completely new miscellaneous metal parts and products surface coating facility where previously no miscellaneous metal parts and products surface coating facility had existed. Since Line 2 was constructed at a facility which already contained miscellaneous metal parts and products surface coating operations, Line 2 is not considered a “new” source under the NESHAP even though the construction may have commenced after August 13, 2002.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

40 CFR 63, Subpart MMMM, was published in the Federal Register on January 2, 2004. Therefore, January 4, 2004 becomes the effective date of this rule. As a result, the following changes have been made to the Part 70 permit:

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after ~~the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products~~ **January 2, 2004**.

D.1.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at **http://www.epa.gov/ttn/atw/misc/miscpg.html**. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after **January 2, 2007** ~~the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM~~.

D.1.12 Notification Requirements [40 CFR 63.3910]

(b) Initial notification. The Permittee must submit the initial notification no later than **January 2, 2005** ~~1 year after the effective date of 40 CFR Part 63, Subpart MMMM~~.

D.1.13 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

(b) The significant permit modification application shall be submitted no later than **April 2, 2006** ~~twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM~~.

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart MMMM] [40 CFR 63.3901]

(a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart MMMM. The Permittee must comply with these requirements on and after ~~the effective date of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products~~ **January 2, 2004**.

D.2.2 National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products [40 CFR Part 63, Subpart MMMM] [40 CFR 63.3882] [40 CFR 63.3883] [40 CFR 63.3980]

(a) The provisions of 40 CFR Part 63, Subpart MMMM (National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at **http://www.epa.gov/ttn/atw/misc/miscpg.html**. Pursuant to 40 CFR 63.3883(b), the Permittee must comply with these requirements on and after **January 2, 2007** ~~the date 3 years after the effective date of 40 CFR Part 63, Subpart MMMM~~.

D.2.14 Notification Requirements [40 CFR 63.3910]

(b) Initial notification. The Permittee must submit the initial notification no later than **January 2, 2005** ~~1 year after the effective date of 40 CFR Part 63, Subpart MMMM~~.

D.2.15 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]

(b) The significant permit modification application shall be submitted no later than **April 2, 2006** ~~twenty-seven months after the effective date of 40 CFR 63, Subpart MMMM~~.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Line 1

Company Name: **Milso Industries**
Address City IN Zip: **401 Industry Parkway, Richmond, Indiana 47374**
Part 70: **T 177-17527**
Plt ID: **177-00061**
Reviewer: **Edward A. Longenberger**
Date: **March 17, 2003**

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Prime Spray Booth (EU-6)																
5553 Grey primer	9.93	63.72%	56.06%	7.7%	66.93%	22.64%	0.09000	18.000	2.30	0.76	1.23	29.57	5.40	6.39	3.36	75%
Brush Spray Booth (EU-12)																
Red copper	7.74	71.47%	0.0%	71.5%	0.00%	28.27%	0.06000	18.000	5.53	5.53	5.97	143.38	26.17	2.61	19.57	75%
Orchid dye	7.77	70.00%	0.0%	70.0%	0.00%	28.84%	0.06000	18.000	5.44	5.44	5.87	140.98	25.73	2.76	18.86	75%
Elgin gold	7.83	69.00%	0.0%	69.0%	0.00%	29.44%	0.06000	18.000	5.40	5.40	5.83	140.04	25.56	2.87	18.35	75%
Aztec gold	7.77	69.60%	0.0%	69.6%	0.00%	31.15%	0.06000	18.000	5.41	5.41	5.84	140.17	25.58	2.79	17.36	75%
Blue steel	7.79	68.26%	0.0%	68.3%	0.00%	30.21%	0.06000	18.000	5.32	5.32	5.74	137.83	25.15	2.92	17.60	75%
Color Spray Booth (EU-16)																
Gold color	7.71	74.67%	0.0%	74.7%	0.00%	19.35%	0.25000	18.000	5.76	5.76	25.91	621.76	113.47	9.62	29.75	75%
Spring beige	8.91	61.73%	0.0%	61.7%	0.00%	26.51%	0.25000	18.000	5.50	5.50	24.75	594.02	108.41	16.80	20.75	75%
Brown shade	7.92	71.28%	0.0%	71.3%	0.00%	22.50%	0.25000	18.000	5.65	5.65	25.40	609.70	111.27	11.21	25.09	75%
Spice color	7.77	71.47%	0.0%	71.5%	0.00%	22.83%	0.25000	18.000	5.55	5.55	24.99	599.75	109.45	10.92	24.32	75%
Russett bronze	7.77	71.94%	0.0%	71.9%	0.00%	23.21%	0.25000	18.000	5.59	5.59	25.15	603.69	110.17	10.74	24.08	75%
Plum color	7.67	73.46%	0.0%	73.5%	0.00%	21.03%	0.25000	18.000	5.63	5.63	25.35	608.51	111.05	10.03	26.79	75%
Topcoat Spray Booth (EU-21)																
Acrylic clear topcoat	8.25	51.36%	0.0%	51.4%	0.00%	32.47%	0.25000	18.000	4.24	4.24	19.07	457.62	83.52	19.77	13.05	75%
Touchup Spray Booth (EU-27A)																
Gold color	7.71	74.67%	0.0%	74.7%	0.00%	19.35%	0.01200	3.000	5.76	5.76	0.21	4.97	0.91	0.08	29.75	75%
Spring beige	8.91	61.73%	0.0%	61.7%	0.00%	26.51%	0.01200	3.000	5.50	5.50	0.20	4.75	0.87	0.13	20.75	75%
Brown shade	7.92	71.28%	0.0%	71.3%	0.00%	22.50%	0.01200	3.000	5.65	5.65	0.20	4.88	0.89	0.09	25.09	75%
Spice color	7.77	71.47%	0.0%	71.5%	0.00%	22.83%	0.01200	3.000	5.55	5.55	0.20	4.80	0.88	0.09	24.32	75%
Russett bronze	7.77	71.94%	0.0%	71.9%	0.00%	23.21%	0.01200	3.000	5.59	5.59	0.20	4.83	0.88	0.09	24.08	75%
Plum color	7.67	73.46%	0.0%	73.5%	0.00%	21.03%	0.01200	3.000	5.63	5.63	0.20	4.87	0.89	0.08	26.79	75%
Final Assembly Area Adhesive (EU-26)																
Camie 373B adhesive	6.20	70.00%	0.0%	70.0%	0.00%	22.10%	0.01210	18.000	4.34	4.34	0.95	22.69	4.14	0.00	19.64	100%
EU-Maintenance																
S-001	6.95	100.00%	0.0%	100.0%	0.00%	0.00%	1.21727	1.000	6.95	6.95	8.46	203.04	37.05	0.00	ERR	100%
Wash/Dry Operation (EU-3)																
Oakite 187 SC	9.30	70.00%	65.0%	5.0%	68.00%	25.00%	0.03000	18.000	1.45	0.47	0.25	6.03	1.10	3.30	1.86	50%
Interior Application Spray Booth (EU-29)																
Gold color	7.71	74.67%	0.0%	74.7%	0.0%	19.35%	0.01200	18.000	5.76	5.76	1.24	29.84	5.45	0.46	29.75	75%
Spring beige	8.91	61.73%	0.0%	61.7%	0.0%	26.51%	0.01200	18.000	5.50	5.50	1.19	28.51	5.20	0.81	20.75	75%
Brown shade	7.92	71.28%	0.0%	71.3%	0.0%	22.50%	0.01200	18.000	5.65	5.65	1.22	29.27	5.34	0.54	25.09	75%
Spice color	7.77	71.47%	0.0%	71.5%	0.0%	22.83%	0.01200	18.000	5.55	5.55	1.20	28.79	5.25	0.52	24.32	75%
Russett bronze	7.77	71.94%	0.0%	71.9%	0.0%	23.21%	0.01200	18.000	5.59	5.59	1.21	28.98	5.29	0.52	24.08	75%
Plum color	7.67	73.46%	0.0%	73.5%	0.0%	21.03%	0.01200	18.000	5.63	5.63	1.22	29.21	5.33	0.48	26.79	75%
								PM	Control Efficiency	98.00%						
Potential to Emit		**Add worst case coating to all solvents**							**Uncontrolled**		**63.29**	**1518.91**	**277.20**	**50.13**		
									Controlled		**63.29**	**1518.91**	**277.20**	**1.00**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emissions Calculations
HAP Emission Calculations

Line 1

Company Name: Milso Industries
Address City IN Zip: 401 Industry Parkway, Richmond, Indiana 47374
Part 70: T 177-17527
Plt ID: 177-00061
Reviewer: Edward A. Longenberger
Date: March 17, 2003

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Ethylbenzene	Weight % MIBK	Weight % Glycol Ethers	Weight % MEK	Weight % Hexane	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	MEK Emissions (tons/yr)	Hexane Emissions (tons/yr)	Total HAPs per coating (tons/yr)
Prime Spray (EU-6)																				
5553 Grey Primer	9.93	0.09000	18.000	0.00%	0.00%	0.10%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	0.07	0.00	0.00	3.52	0.00	0.00	3.59
Brush Spray (EU-12)																				
Red copper	7.74	0.06000	18.000	26.00%	0.00%	0.59%	5.00%	1.00%	17.00%	0.00%	0.00%	9.52	0.00	0.22	1.83	0.37	6.22	0.00	0.00	18.16
Orchid dye	7.77	0.06000	18.000	28.00%	0.00%	0.63%	6.00%	2.00%	11.00%	0.00%	0.00%	10.29	0.00	0.23	2.21	0.74	4.04	0.00	0.00	17.51
Elgin gold	7.83	0.06000	18.000	31.00%	0.00%	1.02%	6.00%	2.00%	9.00%	0.00%	0.00%	11.48	0.00	0.38	2.22	0.74	3.33	0.00	0.00	18.16
Aztec gold	7.77	0.06000	18.000	28.00%	0.00%	0.63%	6.00%	2.00%	11.00%	0.00%	0.00%	10.29	0.00	0.23	2.21	0.74	4.04	0.00	0.00	17.51
Blue steel	7.79	0.06000	18.000	29.00%	0.00%	0.66%	6.00%	2.00%	7.00%	0.00%	0.00%	10.69	0.00	0.24	2.21	0.74	2.58	0.00	0.00	16.46
Diluent - Colorcoat Reducer	6.99	0.01500	18.000	0.00%	55.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	4.55	0.00	0.00	0.00	0.00	1.65	0.00	6.20
Color Spray (EU-16)																				
Gold color	7.71	0.25000	18.000	34.00%	0.00%	0.07%	7.00%	4.00%	0.00%	5.00%	0.00%	51.67	0.00	0.11	10.64	6.08	0.00	7.60	0.00	76.09
Spring Beige	8.91	0.25000	18.000	30.00%	0.00%	0.09%	6.00%	0.00%	8.00%	0.00%	0.00%	52.68	0.00	0.16	10.54	0.00	14.05	0.00	0.00	77.43
Brown shade	7.92	0.25000	18.000	41.00%	0.00%	0.09%	8.00%	0.00%	7.00%	0.00%	0.00%	64.00	0.00	0.14	12.49	0.00	10.93	0.00	0.00	87.56
Spice color	7.77	0.25000	18.000	39.00%	2.00%	0.13%	8.00%	3.00%	0.00%	0.00%	0.00%	59.73	3.06	0.19	12.25	4.59	0.00	0.00	0.00	79.83
Russett bronze	7.77	0.25000	18.000	38.00%	2.00%	0.12%	8.00%	4.00%	0.00%	0.00%	0.00%	58.20	3.06	0.18	12.25	6.13	0.00	0.00	0.00	79.82
Plum color	7.67	0.25000	18.000	41.00%	0.00%	0.11%	8.00%	4.00%	0.00%	0.00%	0.00%	61.98	0.00	0.16	12.09	6.05	0.00	0.00	0.00	80.29
Diluent - Colorcoat Reducer	6.99	0.06300	18.000	0.00%	55.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	19.10	0.00	0.00	0.00	0.00	6.94	0.00	26.04
Topcoat Spray (EU-21)																				
Acrylic clear topcoat	8.25	0.25000	18.000	5.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00%	8.13	0.00	0.00	0.00	8.13	0.00	0.00	0.00	16.26
Diluent - EB Acetate	7.86	0.06300	18.000	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	39.04	0.00	0.00	39.04
Touchup Spray (EU-27A)																				
Gold color	7.71	0.01200	3.000	34.00%	0.00%	0.07%	7.00%	4.00%	0.00%	5.00%	0.00%	0.41	0.00	0.00	0.09	0.05	0.00	0.06	0.00	0.61
Spring Beige	8.91	0.01200	3.000	30.00%	0.00%	0.09%	6.00%	0.00%	8.00%	0.00%	0.00%	0.42	0.00	0.00	0.08	0.00	0.11	0.00	0.00	0.62
Brown shade	7.92	0.01200	3.000	41.00%	0.00%	0.09%	8.00%	0.00%	7.00%	0.00%	0.00%	0.51	0.00	0.00	0.10	0.00	0.09	0.00	0.00	0.70
Spice color	7.77	0.01200	3.000	39.00%	2.00%	0.13%	8.00%	3.00%	0.00%	0.00%	0.00%	0.48	0.02	0.00	0.10	0.04	0.00	0.00	0.00	0.64
Russett bronze	7.77	0.01200	3.000	38.00%	2.00%	0.12%	8.00%	4.00%	0.00%	0.00%	0.00%	0.47	0.02	0.00	0.10	0.05	0.00	0.00	0.00	0.64
Plum color	7.67	0.01200	3.000	41.00%	0.00%	0.11%	8.00%	4.00%	0.00%	0.00%	0.00%	0.50	0.00	0.00	0.10	0.05	0.00	0.00	0.00	0.64
Diluent Colorcoat Reducer	6.99	0.00300	3.000	0.00%	55.00%	0.00%	0.00%	0.00%	0.00%	20.00%	0.00%	0.00	0.15	0.00	0.00	0.00	0.00	0.06	0.00	0.21
Final Assembly Area (EU-26)																				
Camie 373B Adhesive	6.20	0.01210	18.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	75.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	4.44	4.44
(EU-Maintenance)																				
S-001	6.95	1.21727	1.000	0.00%	80.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	29.64	0.00	0.00	0.00	0.00	0.00	0.00	29.64
Wash/Dry (EU-3)																				
Oakite 187SC	9.30	0.03000	18.000	0.00%	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	1.10	0.00	0.00	1.10
Interior Application Booth (EU-29)																				
Gold color	7.71	0.01200	18.000	34.00%	0.00%	0.07%	7.00%	4.00%	0.00%	5.00%	0.00%	2.48	0.00	0.01	0.51	0.29	0.00	0.36	0.00	3.65
Spring beige	8.91	0.01200	18.000	30.00%	0.00%	0.09%	6.00%	0.00%	8.00%	0.00%	0.00%	2.53	0.00	0.01	0.51	0.00	0.67	0.00	0.00	3.72
Brown shade	7.92	0.01200	18.000	41.00%	0.00%	0.09%	8.00%	0.00%	7.00%	0.00%	0.00%	3.07	0.00	0.01	0.60	0.00	0.52	0.00	0.00	4.20
Spice color	7.77	0.01200	18.000	39.00%	2.00%	0.13%	8.00%	3.00%	0.00%	0.00%	0.00%	2.87	0.15	0.01	0.59	0.22	0.00	0.00	0.00	3.83
Russett bronze	7.77	0.01200	18.000	38.00%	2.00%	0.12%	8.00%	4.00%	0.00%	0.00%	0.00%	2.79	0.15	0.01	0.59	0.29	0.00	0.00	0.00	3.83
Plum color	7.67	0.01200	18.000	41.00%	0.00%	0.11%	8.00%	4.00%	0.00%	0.00%	0.00%	2.98	0.00	0.01	0.58	0.29	0.00	0.00	0.00	3.85
										TOTALS:	**(tons/yr):**	**87.2**	**56.5**	**0.652**	**15.4**	**15.3**	**64.7**	**16.6**	**4.44**	
										Total HAPS	**(tons/yr):**	**237.14**								

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Line 2

Company Name: **Milso Industries**
Address City IN Zip: **401 Industry Parkway, Richmond, Indiana 47374**
Part 70: **T 177-17527**
Plt ID: **177-00061**
Reviewer: **Edward A. Longenberger**
Date: **March 17, 2003**

Material	Density (lbs/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Prime spray booth (EU-30)																
Water-Primer WB-6899	10.17	58.32%	48.5%	9.8%	58.9%	27.78%	0.13000	18.750	2.43	1.00	2.43	58.42	10.66	11.31	3.60	75%
Brush spray booth (EU-31)																
4.3 Coppertone HCL-8192M	8.02	61.59%	0.0%	61.6%	0.0%	10.02%	0.04000	18.750	4.94	4.94	3.70	88.91	16.23	2.53	49.30	75%
Color spray booth (EU-32)																
4.3 Coppertone HCL-8192M	8.02	61.59%	0.0%	61.6%	0.0%	10.02%	0.18000	18.750	4.94	4.94	16.67	400.10	73.02	11.38	49.30	75%
Topcoat spray booth (EU-33)																
Reflow Acrylic HAPs-free AM-7836H	7.56	79.74%	0.0%	79.7%	0.0%	14.47%	0.18000	18.750	6.03	6.03	20.35	488.30	89.11	5.66	41.66	75%
Touch-up spray booth (EU-34)																
4.3 Coppertone HCL-8192M	8.02	61.59%	0.0%	61.6%	0.0%	10.02%	0.01000	3.000	4.94	4.94	0.15	3.56	0.65	0.10	49.30	75%
Adhesive area (EU-35)																
Camie Adhesive	6.20	70.00%	0.0%	70.0%	0.0%	22.10%	0.01000	18.750	4.34	4.34	0.81	19.53	3.56	0.00	19.64	100%
Cleaning operations (EU-36)																
S-3440/1620	6.83	100.00%	0.0%	100.0%	0.0%	0.00%	0.06000	18.750	6.83	6.83	7.68	184.41	33.65	0.00	N/A	50%
								PM	Control Efficiency	98.00%						
Potential to Emit			**Add worst case coating to all solvents**						**Uncontrolled**		**51.80**	**1243.23**	**226.89**	**30.99**		
									Controlled		**51.80**	**1243.23**	**226.89**	**0.62**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Line 2

Company Name: **Milso Industries**
Address City IN Zip: **401 Industry Parkway, Richmond, Indiana 47374**
Part 70: **T 177-17527**
Plt ID: **177-00061**
Reviewer: **Edward A. Longenberger**
Date: **March 17, 2003**

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Volume % Non-Volatiles (solids)	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Hexane Emissions	Glycol Ether Emissions	Methanol Emissions
								(tons/yr)	(tons/yr)	(tons/yr)
Prime spray booth (EU-30)										
Water-Primer WB-6899	10.17	0.13000	18.750	27.78%		9.76%		0.00	10.60	0.00
Brush spray booth (EU-31)										
4.3 Coppertone HCL-8192M	8.02	0.04000	18.750	10.02%		6.76%		0.00	1.78	0.00
Color spray booth (EU-32)										
4.3 Coppertone HCL-8192M	8.02	0.18000	18.750	10.02%		6.76%		0.00	8.01	0.00
Topcoat spray booth (EU-33)										
Reflow Acrylic HAPs-free AM-7836H	7.56	0.18000	18.750	14.47%			0.39%	0.00	0.00	0.44
Touch-up spray booth (EU-34)										
4.3 Coppertone HCL-8192M	8.02	0.01000	3.000	10.02%		6.76%		0.00	0.07	0.00
Adhesive area (EU-35)										
Camie Adhesive	6.20	0.01000	18.750	22.10%	75.00%			3.82	0.00	0.00
								3.82	**20.5**	**0.436**
									Overall Total	**24.7**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs